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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,

Individual and Representative  
Plaintiffs,

v.

META PLATFORMS, INC, a Delaware  
corporation,

Defendant.

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Case No. 3:23-cv-03417-VC

**DECLARATION OF BETSY SUGAR IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL RE: EXHIBITS TO META'S  
MOTION IN SUPPORT OF ITS MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

I, Betsy Sugar declare:

1. I am an attorney in the law firm of Lieff Cabraser Heimann & Bernstein counsel for Plaintiffs in the above-captioned case. I am a member of the State Bar of Tennessee and am admitted to practice before this Court *pro hac vice*. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. The following documents contain the Plaintiffs' personal financial information and personal medical information, as well as third parties' personal information. Because such information is personally identifiable information, its disclosure would cause Plaintiffs to suffer harm. In particular, Plaintiffs and third parties face unnecessary loss of privacy if this information unrelated to the litigation were unsealed.

3. Plaintiffs thus redacted the personally identifiable information from the following documents, and filed the unredacted versions under seal (attached to this Motion):

Document	Sealing Request
<b>Ghajar Ex. 6</b> – Meta's Brief	Farnsworth Tr. 304:8, Farnsworth Tr. 304:18, and Farnsworth Tr. 305:12 (PDF pages 5–6).
<b>Ghajar Ex. 6</b> – Meta's Brief	Greer Tr. 231:24–232:3; Greer Tr. 262:20–25 (PDF pages 22–23, 37).
<b>Ghajar Ex. 6</b> – Meta's Brief	Hwang Tr. 128:18–129:22; Hwang Tr. 149:1–2; Hwang 277:7 (PDF pages 46–47, 55, 62).
<b>Ghajar Ex. 10</b> – Meta's Brief	Woodson Tr. 372:5 (PDF page 55).
<b>Ghajar Ex. 17</b> – Meta's Brief	Golden Tr. 288:9 (PDF page 21).
<b>Ghajar Ex. 17</b> – Meta's Brief	Klam Tr. 314:15, 319:4, 319:9 (PDF pages 40–41).
<b>Ghajar Ex. 17</b> – Meta's Brief	Lippman Tr. 283:2, 283:4, 283:8, 283:10 (PDF page 46)
<b>Ghajar Ex. 17</b> – Meta's Brief	Snyder Tr. 198:10 (PDF page 59)

I declare under penalty of perjury that the foregoing is true and correct.

Executed April 25, 2025 in Nashville, TN.

/s/ Betsy A. Sugar  
Betsy A. Sugar